

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRAD AMOS,)	
)	
Plaintiff,)	Case No. 3:21-cv-00923
)	
v.)	District Judge Richardson
)	
THE LAMPO GROUP, LLC, et al,)	Magistrate Judge Holmes
)	
Defendants.)	

**PLAINTIFF’S RESPONSE TO DEFENDANT THE LAMPO GROUP’S FIRST
REQUESTS FOR PRODUCTION**

Plaintiff, Brad Amos, by and through the undersigned counsel and pursuant to Rule 34 of the Federal Rules of Civil Procedure, submits his response to Defendant Dave Ramsey’s (“Ramsey”) First Requests for Production.

For purposes of these requests for production, “records” encompasses anything discoverable under Rule 34 of the Federal Rules of Civil Procedure.

Request No. 1. Produce all records that reference Lampo, Ramsey, or Ramsey Solutions.

RESPONSE: Relevant documents currently in Plaintiff’s possession are attached hereto as Amos (0001-0101).

Request No. 2. Produce all records that Plaintiff generated or obtained in connection with his employment with Lampo.

RESPONSE: Relevant documents currently in Plaintiff’s possession are attached hereto as Amos (0001-0101).

Request No. 3. Produce all records that Plaintiff sent to Lampo.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0005-0008, 0033-0034, 0059-0061, 0065-0068, 0071-0078, 0084-0088, 0094).

Request No. 4. Produce all records that Plaintiff received from Lampo.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0005-0008, 0033-0034, 0059-0061, 0065-0068, 0071-0078, 0084-0088, 0094).

Request No. 5. Produce all communications between Plaintiff and Lampo.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0005-0008, 0033-0034, 0059-0061, 0065-0068, 0071-0078, 0084-0088, 0094).

Request No. 6. Produce all notes regarding communications between Plaintiff and Lampo.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0005-0008, 0033-0034, 0059-0061, 0065-0068, 0071-0078, 0084-0088, 0094).

Request No. 7. Produce all records that support any of Plaintiff's allegations or claims against Defendants in this case.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0001-0101).

Request No. 8. Produce all records that support Plaintiff's claim that Lampo violated the Tennessee Public Protection Act, T.C.A. §50-1-304 ("TPPA").

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0001-0101).

Request No. 9. Produce all records of the reports identified by Plaintiff in his answer to Interrogatory No. 4 of Lampo's First Set of Interrogatories to Plaintiff.

RESPONSE: Plaintiff alludes to his Amended Complaint in his response to Defendant's Interrogatory which has been properly served to Defendant.

Request No. 10. Produce all records of the refusals to participate identified by Plaintiff in his answer to Interrogatory No. 5 of Lampo's First Set of Interrogatories to Plaintiff.

RESPONSE: Plaintiff alludes to his Amended Complaint in his response to Defendant's Interrogatory which has been properly served to Defendant.

Request No. 11. Produce all records that support Plaintiff's claim against Lampo under Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e, *et seq.* ("Title VII").

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as

Amos (0001-0101).

Request No. 12. Produce all records that support Plaintiff's claims against Defendants under the Tennessee Human Rights Act, T.C.A. §4-21-101, *et seq.* ("THRA").

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as **Amos (0001-0101).**

Request No. 13. Produce all records of Plaintiff's religious beliefs described in his answer to Interrogatory No. 6 of Lampo's First Set of Interrogatories to Plaintiff.

RESPONSE: Objection, this request is overly broad and disproportionate to the needs of the case. Notwithstanding this objection, Plaintiff has described his religious beliefs in his response to Defendant's Interrogatory as well as the instances in which Defendant became aware of these beliefs.

Request No. 14. Produce all records that support Plaintiff's allegation that Lampo was aware of his religious beliefs that are the subject of his Title VII and THRA claims against Lampo.

RESPONSE: Objection, this request is overly broad and disproportionate to the needs of the case. Notwithstanding this objection, Plaintiff has described his religious beliefs in his response to Defendant's Interrogatory as well as the instances in which Defendant became aware of these beliefs.

Request No. 15. Produce all records that support Plaintiff's fraud claims against Defendants.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0001-0101).

Request No. 16. Produce all records of the fraudulent statements identified by Plaintiff in his answer to Interrogatory No. 9 of Lampo's First Set of Interrogatories to Plaintiff.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0001-0101).

Request No. 17. Produce all records that support Plaintiff's allegation that the statement, "Lampo had been voted 'best place to work' for over 10 years in a row by their own employees without interference from management", was not true.

RESPONSE: None at this time.

Request No. 18. Produce all records that support Plaintiff's allegation that Lampo management interfered with "best place to work" surveys.

RESPONSE: None at this time.

Request No. 19. Produce all records that support Plaintiff's allegation that Defendants forced employees to participate in "best place to work" polls.

RESPONSE: None at this time.

Request No. 20. Produce all records that support Plaintiff's allegation that Defendants forced employees to include only praise for Lampo and Ramsey in "best place to work" polls.

RESPONSE: None at this time.

Request No. 21. Produce all records that support Plaintiff's allegation that, if employees refused to participate in "best place to work" polls and only include praise for Lampo and Ramsey, Lampo would discipline or terminate them.

RESPONSE: None at this time.

Request No. 22. Produce all records that support Plaintiff's promissory estoppel claim against Lampo.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0001-0101).

Request No. 23. Produce all records of the promises identified by Plaintiff in his answer to Interrogatory No. 10 of Lampo's First Set of Interrogatories to Plaintiff.

RESPONSE: Plaintiff alludes to his Amended Complaint in his response to Defendant's Interrogatory which has been properly served to Defendant.

Request No. 24. Produce all records that support Plaintiff's claim against Lampo under T.C.A. §50-1-102.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0001-0101).

Request No. 25. Produce all records of the deceptive representations identified by Plaintiff in his answer to Interrogatory No. 11 of Lampo's First Set of Interrogatories to Plaintiff.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0001-0101).

Request No. 26. Produce all records that support Plaintiff's allegation that Ramsey directed Lampo to terminate him.

RESPONSE: None at this time.

Request No. 27. Produce all audio recordings and video recordings of any employees of Lampo.

RESPONSE: None at this time.

Request No. 28. Produce all records that support Plaintiff's claim for damages against Lampo in this case.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0001-0101).

Request No. 29. Produce all communications between Plaintiff and third parties that reference Lampo, Ramsey, or Ramsey Solutions.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0001-0101).

Request No. 30. Produce all communications between Plaintiff and third parties that reference this case.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0001-0101).

Request No. 31. Produce all records that support Plaintiff's allegations that Lampo constantly harassed Plaintiff about his home life, told Plaintiff to get his wife on board, told Plaintiff to get his wife on the same page, and told Plaintiff that he needed to check his humility.

RESPONSE: None at this time. Upon information and belief, these documents are in Defendant's possession.

Request No. 32. Produce all IRS Forms W-2, 1099, and K-1 issued to Plaintiff for each year beginning with 2019.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0095-0101).

Request No. 33. Produce all tax returns filed by Plaintiff for each year beginning with 2019.

RESPONSE: Plaintiff has filed no income tax returns solely for himself during this time period. As such, no responsive documents to this matter exist.

Request No. 34. Produce all records of the applications identified by Plaintiff in his answer to Interrogatory No. 13 of Lampo's First Set of Interrogatories to Plaintiff.

RESPONSE: Relevant documents currently in Plaintiff's possession are attached hereto as Amos (0010-0032).

Respectfully submitted,

THE EMPLOYMENT AND CONSUMER LAW GROUP

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was sent via email to the following recipients on this the 6th day of May, 2022.

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